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November 30, 2020

VIA ECF

The Honorable Robert M. Levy
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: AirWair International Ltd. v. Primark US Corp. and Primark Ltd.
Case No.: 1:19-cv-06189-LDH-RML

Dear Magistrate Judge Levy:

Pursuant to the telephonic hearing held by the Court on November 24, 2020 and Defendants' counsel's proposed confidentiality order filed on November 25, 2020 (Dkt. No. 26-1), counsel for Plaintiff submits a further redlined version, attached as Exhibit A hereto, that retains Defendants' redline changes and adds further redline changes proposed by AirWair (highlighted in yellow for ease of identification). AirWair asserts its additional changes are further in the spirit of the Court's ruling, which allows for not only meeting and conferring on confidentiality designations altogether but also on whether other restrictions—i.e., limiting disclosure to outside counsel or to use solely in this action—can be addressed by the Court should the parties' meet and confer efforts fail. Defendants' draft provided no such mechanism, which was discussed at the hearing.

Respectfully submitted,

/s/ Kenneth E. Keller
Kenneth E. Keller

Attorneys for Plaintiff AIRWAIR INT'L LTD.

cc: All Counsel of Record (via ECF)